

REMARKS/ARGUMENTS

This Amendment is responsive to the Office Action mailed on August 4, 2009. In this Amendment, no claims are amended, added or canceled, so that claims 1-9, 11, 13-27, 29-39, 41-47, 49-56, 58-64 and 66-69 are pending and subject to examination.

I. Rejection under 35 U.S.C. §103

Claims 1-9, 11, 13-27, 29-39, 41-47, 49-56, 58-64 and 66-69 are rejected under 35 U.S.C. §103(a) as being obvious over *Chiu* (US 7,051,271) in view of *Croar* (US2007051271B1). This rejection is traversed.

A. Independent Claim 1

As discussed of record, Applicants respectfully submit that obviousness has not been established with regard to independent claim 1. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *Chiu* and *Croar* do not teach or suggest each element of claim 1.

The Office Action alleges that column 2, lines 15-25 of *Chiu* teaches the following features of Applicants' claim 1:

comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, whereby at least a portion of the recorded information matches a feature portion of the presentation material, and determining matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of a plurality of recorded information that matches the feature portion.

However, Applicants respectfully submit that this allegation is in stark contradiction to the admission of the Examiner stated in the previous Office Action dated February 3, 2009. On page 7 of that Office Action, the Examiner expressly admits that “*Chui* does not expressly teach, but *Hull* teaches:

comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, whereby at least a portion of the recorded information matches a feature portion of the presentation material, and determine matching information for each matching portion of the recorded information and feature portion using a matching algorithm configured to map the visual feature to a portion of any of plurality of recorded information that matches the feature portion...” As such, the Examiner has previously **acknowledged in the record of the Application that Chui does not teach the comparing and determining step of claim 1.”** (emphasis in original)

In contrast, the pending Office Action asserts, “*Chui* at Col.1, Lines 15-25, discloses a method for linking a scanned document to a segment of a video is provided. Whereby the scanned document identifier is then compared to the plurality of video frame identifiers; the scanned document is linked to a first video frame in the plurality of video frames responsive to the comparison step.” However, Applicants respectfully submit that the Examiner’s present interpretation of *Chui* is in error and that his previous assertion that *Chui* does not teach such features is correct.

For example, column 2, lines 15-25 recite:

According to an embodiment of the present invention, a method for linking a scanned document to a segment of a video is provided. The margins of a scanned document are removed and the document is scaled. The scanned document is transformed into a scanned document identifier. A video file having a plurality of video frames is then obtained. A plurality of video frames is transformed into a plurality of respective video frame identifiers. The scanned document identifier is then compared to the plurality of video frame identifiers. The scanned document is linked to a first video frame in the plurality of video frames responsive to the comparison step. (emphasis added)

As recited in column 2, lines 15-25 quoted above, the method of *Chui* describes transforming a scanned document and a plurality of video frames into respective “identifiers” and then comparing the “identifiers” to link the scanned document to the plurality of video

frames and not “extracting a visual feature from the electronic representation of the document, the visual feature corresponding to at least a portion of the presentation material...comparing the visual feature to the recorded information to determine a portion of the recorded information that matches the visual feature, whereby at least a portion of the recorded information matches a feature portion of the presentation material,” as recited in independent claim 1. Accordingly, Applicants respectfully submit that the extracting and comparing steps of independent claim 1 are not taught or suggested by *Chui*.

Furthermore, the currently pending Office Action makes no allegation that *Croar* remedies the deficiencies of *Chui* described above. Rather, *Croar* is directed to a system and method for the creation of virtual information packages that provides the capability to scan and store paper documents in a virtual container. The virtual container can also store existing electronics documents in their native format so that them to be used by the applications that created them. (*Croar*, see abstract). *Croar* does not teach or discuss comparing video frames with scanned documents to link the two and therefore cannot make up for the deficiencies of *Chui*. As such, neither *Chui* nor *Croar*, alone or in combination, teach or suggest all of the claimed limitations currently pending in the Application.

For at least this reason, Applicants respectfully submit that obviousness has not been established and request that the rejection under §103 of independent claim 1, and all claims dependent therefrom, be withdrawn and the claims allowed.

B. Independent Claims 21, 34, 44, 51, 61, 68 and 69

As noted in the pending Office Action, independent claims 21, 34, 44, 51, 61, 68 and 69 incorporate similar subject matter of claim 1 discussed above. As such, *Chui* and *Croar* also fail to render claims 21, 34, 44, 51, 61, 68 and 69 obvious for reasons similar to those discussed above in reference to claim 1.

C. Dependent Claims

Dependent claims 2-9, 11, 13-20, 22-33, 35-39, 42-43, 45-47, 49-50, 52-56, 58-60, 62-64 and 66-67 are allowable by virtue of depending from allowable subject matter discussed above

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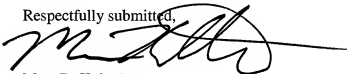
and include additional patentable subject matter. For this reason, Applicants respectfully request that the rejection of these claim under §103 be withdrawn and the claims allowed.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 415-576-0200.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Knittel', with a long horizontal line extending to the right.

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Attachments
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